FAMILY INVESTMENT ADMINISTRATION

Policy Number:	#25-03
Policy Title:	New Hire, Death, Prison And Public Assistance Reporting Information System (PARIS) Match Requirements
Release Date:	November 13, 2024
Effective Date:	Immediately
Approved By:	Augustin Ntabaganyimana Executive Director Family Investment Administration (FIA)
Revision Date(s):	Original: October 25, 2013 and June 28, 2021; Revisions: June 6, 2014, March 23, 2018
Supersedes:	FIA Action Transmittal (AT) #21-26 (previous version released June 28, 2021); AT #18-18 (previous version released March 23, 2018)
Originating Office:	Office of Operations fia.policy@maryland.gov
Required Actions:	This Action Transmittal is to provide guidance on New Hire, Death, Prison and PARIS Data Match requirements.
Key Words:	Adverse action, termination of benefits, clearances, data match, alerts, New Hire, Death, Prison and PARIS
Related Federal Law	CFR § 273.12(c)(3) CFR § 273.13 CFR § 272.12 CFR § 272.16
Related State Laws	Not Applicable
COMAR	Not Applicable
State Plan Implications?	Yes



Department of Human Services 25 S. Charles Street Baltimore MD 21201

Control Number: # 25-03

FAMILY INVESTMENT ADMINISTRATION (FIA) ACTION TRANSMITTAL

Effective Date: Immediately

Issuance Date: November 13, 2024

TO: LOCAL DEPARTMENTS OF SOCIAL SERVICES (LDSS)

DIRECTORS, LDSS DEPUTY/ASSISTANT DIRECTORS FOR

FAMILY INVESTMENT. FAMILY INVESTMENT SUPERVISORS AND

ELIGIBILITY STAFF

FROM: AUGUSTIN NTABAGANYIMANA, EXECUTIVE DIRECTOR

WARREN WATERS, DIRECTOR, OFFICE OF MEDICAID ELIGIBILITY

SERVICES M

RE: NEW HIRE, DEATH, PRISON, AND PUBLIC ASSISTANCE

REPORTING INFORMATION SYSTEM (PARIS) DATA MATCHES

REOUIREMENTS

PROGRAM AFFECTED: SUPPLEMENTAL NUTRITION ASSISTANCE

PROGRAM TEMPORARY CASH ASSISTANCE

PUBLIC ASSISTANCE TO ADULTS

TEMPORARY DISABILITY ASSISTANCE PROGRAM

REFUGEE CASH ASSISTANCE MEDICAL ASSISTANCE PROGRAM

ORIGINATING OFFICE: OFFICE OF PROGRAM OPERATIONS

Summary

This Action Transmittal (AT) outlines the policy and processing procedures for New Hire, Death, Prison, and Public Assistance Reporting Information System (PARIS) Data Matches.

The Local Department of Social Services (LDSS) shall **not** take any adverse action to terminate, deny, suspend, or reduce benefits to an applicant or

recipient based on information produced by a computer data match until the information has been independently verified, <u>or</u> the matched individual has been provided notice of the match and is given the opportunity to contest or provide clarity into the findings.

All data matches including the National Directory of New Hires (NDNH), State New Hire matches, Prison matches, Death matches, and PARIS matches (Interstate matches, VA matches, Federal Matches) are **only required at application and recertification**.

Match alerts will continue to be generated in the E&E system. The alerts associated with the following matches must be properly addressed and dispositioned by a case manager when processing an application or a recertification application. The LDSS must pursue a secondary source for clarification and verification of incomplete or unclear information resulting from data matches. A secondary source of verification is independent verification used by the case manager to verify the information received from the primary source (New Hire Match, Prison Match, Death Match, and PARIS Match).

Required Action

When processing an application or recertification, the LDSS must review and act on all open/active Electronic Data Exchange Work Item Alerts.

The LDSS must:

- 1. Determine the appropriate action to take for each alert,
- 2. Take the appropriate action,
- 3. Disposition the alert accordingly, and
- 4. Narrate all action taken for the household.

New Hire Match

Case managers must use the mandatory clearance processes to determine the appropriate course of case action.

- A. Case managers must attempt to independently verify match information from a secondary source such as The Work Number, and BEACON systems;
- B. Require verification from the customer only if the information cannot be validated using secondary sources; and
- C. Follow the steps detailed in the <u>E&E How-to-Guide: Review New Hire</u> Interface Results located in E&E's Help section.

Prison Match

Prison matches require a secondary source of verification. The Supplemental Nutrition Assistance Programs (SNAP) benefits must be terminated/denied for persons incarcerated for more than 30-days. For persons incarcerated for more than 30-days, the incarceration must be verified by a secondary source before SNAP benefits are terminated/denied. Some examples of secondary sources to use to verify prison matches include online police records, VINELink, and collateral contact with the specified prison.

- A. Case managers must attempt to independently verify match information from a secondary source such as clearances;
- B. If unable to verify using secondary sources such as clearances or collateral contact, case managers must send the customer a DHS/FIA 220 Notice of Match Results form to the most current address in the case record and allow the customer 10 days to resolve the match results; and
- C. Follow the steps detailed in the <u>E&E How-to-Guide</u>: <u>Prison Doc Match Interface Search</u> located in E&E's Help section.

Death Match

Death matches require a secondary source of verification. SNAP benefits must be terminated/denied for deceased individuals. The death date for the deceased individual must be verified by a secondary source before SNAP benefits can be terminated/denied. Secondary sources include but are not limited to a death certificate, obituary, or collateral contact from a trusted source.

- A. Case managers must attempt to independently verify match information from a secondary source such as clearances:
- B. If unable to verify using secondary sources such as clearances or collateral contact, case managers must send the customer a DHS/FIA 220 Notice of Match Results form to the most recent address in the case record and allow the customer 10 days to respond before taking an adverse action; and
- C. Follow the steps detailed in the <u>E&E How-to-Guide</u>: <u>Enter Date of Death</u> located in E&E's Help section.

PARIS Match

PARIS matches (Interstate match, federal match, and Veterans Administration (VA) database match) require a secondary source of verification.

A. Case managers must attempt to independently verify match

information from a secondary source such as clearances; and B. If unable to verify using secondary sources such as clearances or a collateral contact, case managers must send the customer a DHS/FIA 220 Notice of Match Results form and allow the customer 10 days to resolve the match results.

Interstate Match

SNAP benefits must be terminated/denied for households/individuals collecting SNAP benefits in more than one state.

Dates of the household/individual collecting benefits in more than one state must be verified by a secondary source before SNAP benefits can be terminated/denied.

Secondary sources include collateral contact, email contact, and/or an approval notice from the state agency where the customer is purportedly receiving benefits.

Federal Match

Households/individuals collecting a salary or retirement pension as a current or former U.S. military or civil service employee must be verified by a secondary source before SNAP benefits can be decreased or terminated/denied.

Secondary sources include an award letter, monthly statements, and collateral contact with the federal agency.

Veterans Administration (VA) Database Match

Households/individuals collecting Veterans benefits must be verified by a secondary source before SNAP benefits can be decreased or terminated/denied.

Secondary sources include an award letter, monthly statements, and collateral contact with the federal agency.

Policy Reminders

Unclear Information

During the certification period, the LDSS might obtain unclear information about a household's circumstances from which the LDSS cannot readily determine the effect on the household's continued eligibility for SNAP or, in

certain cases, benefit amounts. The LDSS may receive unclear information from a third party. Unclear information is information that is not verified, or information that is verified but the LDSS needs additional information to act on the change.

The LDSS must pursue clarification and verification of household circumstances using the following procedure if unclear information is received in between MBR and redetermination periods:

- A. If the information obtained is less than 60 days old relative to the current month of participation, a case manager must follow up on the unclear information:
 - a. If the customer was mandated to report the information based on Simplified Reporting requirements; or
 - b. If the information appears to present a significant conflict from previously reported household information.
- B. If the information obtained is more than 60 days old relative to the current month of participation, the case manager must follow up on the unclear information if the information will result in a potential increase in benefits.
 - a. If the agency cannot verify the information using a collateral contact or through computer match systems, the case manager must issue a 220 FIA Notice Match Result form or a 1052 to obtain the verification.

Simplified Reporting Reminders

All SNAP households excluding Elderly Simplified Application Project (ESAP) and Maryland Senior Nutrition Assistance Program (MSNAP) households are simplified reporters (SR).

Simplified reporting households are required to report changes only at Recertification and on the Maryland Benefit Review form, except:

- A. Whenever the household's income exceeds 130% of the federal poverty level (FPL);
- B. Whenever able-bodied adults subject to the time limit changes in work hours that bring an individual below 20 hours per week, averaged monthly;
- C. Whenever a household member receives \$3,500 or more through lottery or gambling winnings.

Simplified Reporting households receiving benefits from a program with more extensive reporting requirements (TCA, MA, TDAP, or PAA) must follow

the reporting requirements for that program. The case manager must act on these reported changes for SNAP.

Resources

E&E How-to-Guide: Enter Date of Death

<u>E&E How-to-Guide: Prison Doc Match Interface Search</u>

<u>E&E How-to-Guide: Review New Hire I</u>nterface Results

TCA Policy Manual Section 208 Clearances and System Matches Rev. 11.22

DHS/FIA 220 - Notice Match Results Form

AT 19-05 Unclear Informations

Inquiries

Please direct policy questions to FIA Policy by completing the <u>FIA Policy Information Request Form</u>. Montgomery County staff may submit their policy questions via email at <u>fia.policy@maryland.gov</u>. For questions related to E&E, please email <u>fia.bsdm@maryland.gov</u>.

cc: DHS Executive Staff
FIA Management Staff
MDH Executive Staff
Constituent Services
DHS Help Desk
Office of Administrative Hearings